

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JAN 13 2016

United States of America

v.

IRIEL CLAUDIA FRANKLIN

Case No.

David J. Bradley, Clerk of Court

H16-70 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Spetember 2012 - August 2015 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 USC Sec. 513(a)

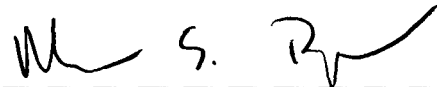
Counterfeiting Securities

18 USC Sec. 1344

Bank Fraud

This criminal complaint is based on these facts:

See attached Affidavit of US Postal Inspector Matthew S. Boyden

☒ Continued on the attached sheet.*Complainant's signature*

US Postal Inspector Matthew Boyden

Printed name and title

Sworn to before me and signed in my presence.

Date:

1/13/16

City and state:

Houston, Texas*Judge's signature*

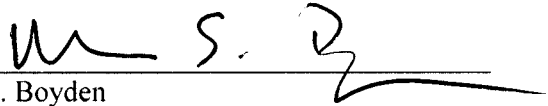
U.S. Magistrate Judge John R. Froeschner

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

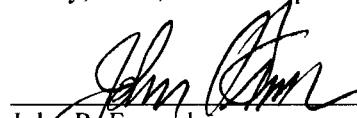
1. Affiant, United States Postal Inspector Matthew S. Boyden, has been employed by the U.S. Postal Inspection Service since January 2000. Affiant is currently assigned to the Major Fraud team in Houston, Texas. Prior to that, Affiant served as a lieutenant of police for a municipal police department in Texas. Affiant has served in the U.S. Air Force as a Law Enforcement Specialist and criminal investigator for the Air Force Office of Special Investigations. Affiant has received specialized training in numerous Postal crimes, but primarily those involving “identity theft” and mail fraud related offenses. Affiant has attended training in the areas of check fraud, credit card fraud, and identity takeover schemes. Affiant has investigated hundreds of cases involving fraud, identity theft, and related “white collar” types of offenses. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against **IRIEL CLAUDIA FRANKLIN**.
2. The information set forth in this Affidavit is based upon your Affiant’s personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that **IRIEL CLAUDIA FRANKLIN** (FRANKLIN) has committed violations of federal law.
3. Texas Premier Resources, LLC, dba Premier Tank Truck Service and PTT Oil Field Services, is a Houston-based company that operates an oil field service business focused on fluid transportation logistics. The company has annual revenue in excess of \$15 million and employs over 120 people and is an organization affecting interstate commerce. In 2012, FRANKLIN was hired as a book keeper for the company. One of her primary duties was to manage the company’s accounts payable and bank reconciliation functions. While in that position, FRANKLIN stole in excess of \$1.1 million by altering the company’s finance software and forging company checks which she deposited into accounts she controlled.

4. FRANKLIN used the company's Intuit product called "Quick Books" to carry out her scheme. FRANKLIN created an expense and entered a dollar amount in the Quick Books system. She then printed out a check listing herself as the payee and forged the owner's signature on the company check. She then took the check to her bank and deposited it into her account or an account she controlled. To conceal her fraud, FRANKLIN would go back into the accounting system and change the expense from herself to a legitimate vendor. In a further attempt to conceal her scheme, FRANKLIN would alter the company's bank statements and remove the check images that came with the statements. PTT company accounts are or were located at The Bank of River Oaks and the International Bank of Commerce (IBC). FRANKLIN deposited or negotiated the checks through accounts she controlled at Chase Bank and Wells Fargo Bank. Affiant knows from training and experience that the aforementioned financial institutions are insured by the Federal Deposit Insurance Corporation.
5. In August 2015, the company owner confronted FRANKLIN after figuring out she had been stealing. During that interview FRANKLIN admitted she had been stealing by forging company checks and was terminated. The Houston Police Department was contacted and a report was made.
6. Affiant has obtained and reviewed the victim company's records as well as the deposit records for FRANKLIN. Affiant has identified over 220 checks totaling in excess of \$1.1 million that were forged and negotiated by FRANKLIN. A review of the account records shows FRANKLIN used the money for personal gain. Affiant contacted FRANKLIN in December 2015 and asked to speak to her about this matter but she declined the offer. Affiant has obtained and reviewed law enforcement databases which depict IRIEL CLAUDIA FRANKLIN has criminal history records in Texas, Louisiana, and Georgia.
7. Based upon the above, the undersigned believes there is probable cause to believe that **IRIEL CLAUDIA FRANKLIN** has committed crimes in violation of Title 18, United States Code, Sections 513(a) and 1344.



Matthew S. Boyden
United States Postal Inspector

Sworn and Subscribed to me this 13th day of January, 2016, and I find probable cause.



John R. Froeschner
United States Magistrate Judge
Southern District of Texas